

MICHAEL J. KURGAN
6538 Collins Avenue
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Defendant Pro Se

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

THE LANCE AND LINDA NEIBAUER
JOINT TRUST, by and through LANCE
NEIBAUER, as trustee,

Plaintiff

vs.

MICHAEL J. KURGAN, an individual,

Defendant.

Case No. 6:14-cv-01192-MC

DEFENDANTS RESPONSE TO
PLAINTIFF'S FIRST JUDGMENT
DEBTOR INTERROGATORIES TO
DEFENDANT

To: Plaintiff and its attorney of record:

Pursuant to Rules 26, 69(a)(2) and 33 of the Federal Rules of Civil Procedure ("FRCP"), Defendant hereby responds to the Plaintiff The Lance and Linda Neibauer Joint Trust, by and through Lance Neibauer, as trustee ("Plaintiff"), interrogatories propounded to Defendant Michael J. Kurgan ("Defendant").

PAGE 1 – DEFENDANTS RESPONSE TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO DEFENDANT

INTERROGATORIES TO JUDGMENT DEBTOR, MICHAEL KURGAN

INTERROGATORY NO. 1: State your full name, your Social Security number, your current residential address and your residential telephone number.

RESPONSE NO. 1:

Defendant objects to the Interrogatory to the extent that it requests the Defendant's Social Security Number as that is confidential information that is not likely to aid in the enforcement of the judgment. Without waiving the objection:

MICHAEL J. KURGAN
134 Rutland Blvd
West Palm Beach, FL 33405
Phone NA

INTERROGATORY NO. 2: State your spouse or partner's name and residence address.

RESPONSE NO. 2:

Elisabeth Gonzalez
134 Rutland Blvd
West Palm Beach, FL 33405

INTERROGATORY NO. 3: State and describe your occupation. When describing your occupation, include *at least* the following information:

- a. Job title;
- b. Employment commencement date;
- c. Job responsibilities;
- d. Current salary.

RESPONSE NO. 3:

- a. Job title; Chief Executive Officer
- b. Employment commencement date; 12/1/2008
- c. Job responsibilities; CEO
- d. Current salary. I do not receive any salary.

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INTERROGATORIES TO DEFENDANT

INTERROGATORY NO. 4: State the name, address and telephone number for each company or person who has employed you, or contracted for your services, since July 1, 2012.

RESPONSE NO. 4:

As chief Executive Officer and COO, I have not been employed or had my services contracted for since July 1, 2012 other than as an officer of Service Wing and Matseco, Inc. Both located at 8565 S. Eastern Ave., Suite 150, Las Vegas, NV 89123
Service Wing Phone number 858.461.5200 Matseco 702.861.0100

INTERROGATORY NO. 5: If you have been self-employed at any time since July 1, 2012, list, in chronological order, the name and location of the business and the nature of the work.

RESPONSE NO. 5:

Not Applicable.

INTERROGATORY NO. 6: List all sources of funds, including the amount of the funds, received by you for the past two (2) years and indicate whether you receive such funds on a regular basis. Sources of funds include, but are not limited to gifts, bequests, alimony, support or property settlement payments, cash prizes, gaming winnings, judgments, settlements, monies in trust, interest income, proceeds from the sale of collectibles, loans, or lines of credit. (Attach additional sheets if necessary).

RESPONSE NO. 6:

None as I understand the definition of you.

INTERROGATORY NO. 9: List all business interests in which you are a sole proprietor, a partner, or a joint venturer. For each interest, list the following:

- a. Name and address of the business.
- b. Name(s) and address(es) of the partners or joint venturers.
- c. Nature of the business, partnership or joint venture.
- d. Net value of your interest in the business.

(Attach additional sheets if necessary)

RESPONSE NO. 9:

I am not a sole proprietor, a partner, or a joint venture of any business.

INTERROGATORY NO. 10: List all corporations in which you are either a shareholder, director or officer (or combination thereof). For each corporation, list the following:

- a. Name and address of the business.
- b. Nature of the business.
- c. Number of corporate shares outstanding.
- d. Number of corporate shares held by you.
- e. Net value of corporate assets.
- f. Value of your interest in the corporation.
- g. Your position, if you are an officer or director of the corporation.
- h. Your compensation, if you are an officer, director, or employee of the corporation.
- i. Location of share certificate.

(Attach additional sheets if necessary).

RESPONSE NO. 10:

- a. Name and address of the business. Service wing Healthcare, Service Wing Solutions, Precision Approach, Matseco.
- b. Nature of the business. Early-stage Company that develops and markets technology tools. Matseco develops commercial water treatment.
- c. Number of corporate shares outstanding. 20,000,000,/ 20,000.00/ 10,000,000, 10,000,000
- d. Number of corporate shares held by you.0
- e. Net value of corporate assets. NA, NA, NA, NA
- f. Value of your interest in the corporation. 0

- g. Your position, if you are an officer or director of the corporation. CEO, CEO, CEO, COO
- h. Your compensation, if you are an officer, director, or employee of the corporation.
None.
- i. All 8565 S. Eastern Ave., Suite 150, Las Vegas NV 89123

INTERROGATORY NO. 11: List all limited liability companies in which you are a member, manager or officer (or combination thereof). For each LLC, list the following:

- a. Name and address of the business.
- b. Nature of the business.
- c. Number of member interests outstanding.
- d. Percentage of profits and losses to which you are entitled.
- e. Net value of corporate assets.
- f. Value of your interest in the limited liability company.
- g. Your position, if you are an officer or manager of the limited liability company.
- h. Your compensation, if you are an officer, manager, or employee of the limited liability company.

(Attach additional sheets if necessary).

RESPONSE NO. 11:

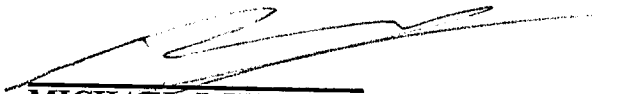
NONE, and therefore NOT APPLICABLE

INTERROGATORY NO. 12: List all real property which you own, rent or are buying or have owned in the past 2 years. For each property, include the following information:

- a. Address of the property.
- b. Type of property (home, lot, apartment, etc.).
- c. Whether you own the property, are renting the property, or are buying the property on a contract.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
CORRECT AND THIS WAS EXECUTED ON THE DATE SET FORTH BELOW.

DATED: July 19, 2017.



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Defendant Pro Se

PAGE 21 – DEFENDANTS RESPONSE TO PLAINTIFF’S FIRST SET OF
INTERROGATORIES TO DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2017, I served the foregoing DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT on the following:

Nicholas J. Henderson, OSB No. 074027

Email: nhenderson@portlaw.com

Motschenbacher & Blattner, LLP

117 SW Taylor Street, Suite 200

Portland, Oregon 97204-3029

Telephone: (503) 417-0508

Facsimile: (503) 417-0501

☒ **Via First Class Mail**

☐ Via Facsimile

☐ Via Hand Delivery

☐ Via ECF Notification

☐ Via Electronic Mail to:

DATED: July 19, 2017.


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6538 Collins Avenue

Unit 288

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Phone (858) 480-9330

E-Mail n461bb@gmail.com

Defendant Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2017, I re-served the foregoing DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT on the following:

Nicholas J. Henderson, OSB No. 074027

Email: nhenderson@portlaw.com

Motschenbacher & Blattner, LLP

117 SW Taylor Street, Suite 200

Portland, Oregon 97204-3029

Telephone: (503) 417-0508

Facsimile: (503) 417-0501

[X] Via Priority Mail Trackable

[] Via Facsimile

[] Via Hand Delivery

[] Via ECF Notification

[] Via Electronic Mail to:

DATED: July 19, 2017.



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